REMARKS/ARGUMENTS

These remarks are submitted in response to the Office Action of August 11, 2006 (hereinafter Office Action). As this response is timely filed before the expiration of the 3-month shortened statutory period, no fee is believed due. Nonetheless, the Examiner is expressly authorized to charge any deficiencies to Deposit Account No. 50-0951.

In the Office Action, each of the claims was rejected on the basis of new grounds of rejection. Claims 1-14, 17-25, and 28-29 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,604,075 to Brown, *et al.* (hereinafter Brown). Claims 15, 16, 26, and 27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of U.S. Patent No. 7,020,841 to Dantzig, *et al.* (hereinafter Dantzig).

Claim Amendments

Independent Claims 1, 7, 8, and 19 have each been amended to emphasize certain aspects of Applicants' invention. Although the substance of the claims is unchanged, the language has been altered to emphasize that information-dependent grammars referred to in the claims are not generated in a network-connected client, but rather sent to the client in a usable form by a network-connected server; that is, the client does not receive information that must be compiled as part of a grammar generation process in order to generate one or more grammars, but instead, receives the grammars directly.

The language, moreover, emphasizes an additional aspect of the invention. Specifically, the language emphasizes that processing of the results of a speech recognition engine based on the information-dependent grammars is performed independently in the client by a speech recognition engine in a voice navigation component.

The claim amendments, as discussed herein, are fully supported throughout the Specification. (See, e.g., Specification, p. 8, lines 7-12; p. 8, line 26 – p. 9, line 3; and p. 10, lines 24-27.) No new matter has been introduced by the claim amendments.

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Aspects of Applicants' Invention

At this juncture, it may be helpful to reiterate certain aspects of Applicant's invention. One embodiment of the invention, typified by independent Claim 1, is a client system for gathering information via a network using voice input. The client system can include a speech recognition engine that is installed on the client system. Additionally, the client system can include a communication component, also installed on the client system, that is configured to establish communications with a communication component on a server system. The communication component can provide the client system access to information stored on the server.

The client system can further include a voice navigation component. The voice navigation component can be configured to provide information-dependent grammars to the speech recognition engine via the communication component based on initial information loaded from the server to the client. More particularly, the information-dependent grammars can be received from the server in a directly-usable form. The information-dependent grammars can be configured to process results of the speech recognition system independently of the server. (See, e.g., Specification, p. 8, lines 7-12; p. 8, line 26 – p. 9, line 3; and p. 10, lines 24-27.)

The Claims Define Over The Prior Art

Claims 1-14, 17-25, 28, and 29 were each rejected as being anticipated by Brown. Brown is directed to a system and method for gathering information in response to voice-based input. Specifically, Brown provides a web-based voice dialog interface for communicating "dialog information" between a user at a client and one or more servers in communication with the client. (See Col. 2, lines 36-58; see also Abstract.)

Applicants respectfully submit, however, that Brown fails to expressly or inherently teach every feature recited in the claims. For example, Brown does not disclose, either expressly or inherently, a network-connected client's receiving from a

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network-connected server grammars that are received in a directly-usable form, as recited

in each of independent Claims 1, 7, 8, and 19. Instead, Brown teaches the conveyance of

information that serves as input in a "grammar generation process" performed at a client.

Accordingly, Brown fails to teach that grammars, in a directly-usable form, are received

by a client directly from a server. Brown's client-based grammar generation process is

explicitly described in the reference:

> "[The client-side portion of a system] receives HTML information from the
> Internet or other computer network in an HTML interpreter 102 which
> processes the HTML information to generate a rendering 104, i.e., an
> audibly-perceptible output of the corresponding HTML information for
> delivery to a user. The rendering 104 may include both visual and audio
> output. The HTML information is also delivered to a grammar compiler
> 106 which processes the information to generate a syntax 110 and a set of
> lexical semantics 112. The grammar compiler 106 may be of the type
> described in M. K. Brown and J. G. Wilpon, "A Grammar Compiler for
> Connected Speech Recognition," IEEE Trans. ASSP, Vol. 39, No. 1, pp.
> 17-28, January 1991, which is incorporated by reference herein. The HTML
> interpreter 102 also generates a client library 114. (Col. 7, lines 32-46.)
> (Emphasis Supplied.)

The client-side portion of Brown's system is explicitly described as including all

elements, including both the HTML interpreter (102) and grammar compiler (106),

shown in FIG. 1 of the reference, save for an exemplary Web-based server (128). (Col.

7, lines 14-25.) The quoted language reveals that, in Brown, a client does not receive a

grammar. Rather, the client in Brown receives HTML information. To generate a

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grammar with Brown, the HTML information must be processed by a grammar compiler, which resides in the client.

Moreover, although Brown's grammar compiler is elsewhere more generally described as a "grammar processing device" that incorporate a grammar generator or receives input from a grammar generator (see Col. 7, lines 63-67), the processing relies on HTML information received by the client so that the client can generate grammars used for voice processing:

> "[T]he grammar compiler 106 may incorporate or otherwise utilize a grammar generation process, such as that described in greater detail in the above-cited U.S. patent application Ser. No. 09/168,405, filed Oct. 6, 1998 in the name of inventors M. K. Brown et al. and entitled "Web-Based Platform for Interactive Voice Response." For example, such a grammar generation process can receive as input parsed HTML, and generate [Grammar Specification Language (GSL)] therefrom. The grammar compiler 106 may be configured to take this GSL as input and create an optimized finite-state network for a speech recognizer. More particularly, the GSL may be used, e.g., to program the grammar compiler 106 with an expanded set of phrases so as to allow a user to speak partial phrases taken from a hyperlink title. In addition, a stored thesaurus can be used to replace words with synonyms so as to further expand the allowed language." (Col.

As described, Brown's grammar generation process relies on HTML or other information received from a server for generating grammars, the grammars being generated by the client. It follows that Brown teaches something very different from Applicants' invention. Applicants respectfully maintain that Brown does not teach the

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conveyance of grammars in a directly-usable form from a server to a client, as explicitly recited in independent Claims 1, 7, 8, and 19.

FIG. 1 of Brown also highlights another fundamental distinction between the reference and Applicants' invention. As already noted, with Brown's speech recognition system, the client-side includes all the elements shown in FIG. 1 save the Web server. As illustrated in the figure, however, the Web server works in conjunction with the other elements to effect voice processing. More particularly, as shown, the response of the voice recognition system (120) is processed by the interpreter (122), the client executive (124), and the common gateway interface (126), working in combination with the Web server (128). (See also Col. 8, lines 1-9.) It follows that Brown further fails to teach processing results of a speech recognition engine in a voice navigation component of a client independently of a server.

Accordingly, Brown fails to expressly or inherently teach every feature recited in independent Claims 1, 7, 8, and 19. Applicants respectfully submit, therefore, that each of Claims 1, 7, 8, and 19 defines over the prior art. Applicants further respectfully submit that whereas the dependent claims each depends from one of independent Claims 1, 7, 8, and 19 while reciting additional features, the dependent claims likewise define over the prior art.

Claims 15, 16, 26, and 27

With respect to dependent Claims 15, 16, 26, and 27, more particularly, each was rejected at pages 5-6 of the Office Action as being unpatentable over Brown in view of Dantzig. Although Applicants do not agree, Applicants respectfully submit that the issue is moot. Applicants assert a priority date that is earlier than that of Dantzig by virtue of their foreign filing of November 23, 2000. (See Specification, p. 1, lines 2-3.) Moreover, at the time of the claimed invention, both Dantzig and the invention were commonly
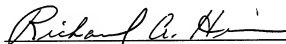
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owned by the same entity. Applicants respectfully submit, therefore, that Dantzig is statutorily precluded from being asserted against Applicants' invention.

CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Response, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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